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August 12, 2024

VIA ECF

Honorable John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street, Room 1320
New York, NY 10007

**Re: *Reclaim the Records and Alec Ferretti v. United States Department of State,*
No. 23 Civ. 1650 (JPC)**

Your Honor:

I am of counsel to Plaintiffs in the above-referenced action, brought pursuant to the Freedom of Information Act ("FOIA") following Defendant's failure to respond to Plaintiffs' FOIA request seeking a copy of passport records held by the State Department.

I write with the consent of the Defendant to respectfully request permission to file our reply memorandum of law on our cross-motion for summary judgment. Defendant filed their opposition papers on June 27, 2024. On that date, I was mid-way through an unanticipated weeklong hospitalization, from which I required several weeks of recovery and recuperation time. I have now returned to work and have finalized the reply memorandum, and am attaching it herewith for the Court's review and hopeful acceptance.

I thank the court for its consideration of this matter.

Hon. John P. Cronan

August 12, 2024

Page 2

Respectfully submitted,

/s/ Benjamin Meyers

Benjamin Meyers

cc: Defendant's counsel (by ECF)